



OLDHAM COUNCIL

Place and Economic Growth

Public Protection

FOOD SERVICE PLAN

2023 / 2024

1.0 SERVICE AIMS AND OBJECTIVES

To ensure that all food intended for human consumption which is manufactured, prepared, or sold within Oldham complies with food safety and food standards requirements. This will be achieved through developing management confidence in those who operate food businesses and also with advice/education, programmed inspections, the investigation of complaints and sampling enforcement initiatives.

2.0 BACKGROUND

2.1 Oldham Profile

Oldham has a population in the region of 242,100 (March 2021 Census), an increase of around 17,200 since the 2011 census. The increases are in certain age groups, notably school-age children, and people in their 50's and 70's.

The Borough covers 141 square miles and is of great contrasts. The east of the Borough is a rural area, characterised by moorland and valley villages and comprises more than half the geographical area of the Borough but contains only a tenth of the population. In contrast, the west of the Borough is an area of mixed urban development with more than one in five of the residents living in income deprived households.

22.5% of the population of Oldham belong to an ethnic minority group, of which the majority are of Pakistani and Bangladeshi origin. The composition of the population in Oldham also shows a higher proportion of young people than elsewhere, and fewer elderly people.

2.2 Organisational Structure

As outlined in Appendix 1

2.3 Scope of the Food Service

Oldham's Food Service is responsible for both food safety (unsafe food and unhygienic practices) and food standards (quality/composition/labelling) within food businesses.

The team also carry out Health and Safety and smoking compliance inspections in a range of food premises. The Environmental Health Officers are also responsible for infectious disease control which includes taking a leading investigative role in any infectious disease outbreaks in association with Greater Manchester Public Health England.

2.4 Demands on the Food Service

- 2.4.1 The Authority currently has approximately 1,956 food premises with 1,488 restaurants and caterers. This includes 13 approved premises that carry out specialist processes in relation to food of animal origin. These small but high-risk manufacturers require specific approval to trade.

2.4.2 Approximately 10% of food business owners do not have English as their first language. These are mainly proprietors of ethnic catering establishments i.e., Pakistani or Bangladeshi.

2.4.3 The current economic climate gives rise to intense competition with some businesses cutting corners to save money which can directly affect food safety.

Premises Profile	
Manufacturer/Packer	28
Importer/ Exporter	2
Distributor/ Transporter	25
Retailers	413
Restaurants and Caterers	1488
Total	1956

High Risk Approved Premises	
Dairy Products	5
Meat Products	3
Cold Store	5
Total	13

2.5 Enforcement Policy

The service adheres to the Oldham Corporate Enforcement Policy which was developed in accordance with the Regulators' Compliance Code (2014). The policy can be found on Oldham Council's website.

https://www.oldham.gov.uk/downloads/file/7252/enforcement_policy

3.0 SERVICE DELIVERY 2023/2024

3.1 Food Service Inspections/Interventions

3.1.1 In accordance with FSA Statutory Codes of Practice, food safety and food standards inspections are carried out on a risk priority basis with higher risk premises being inspected more frequently – the table below shows risk rating and inspection frequency. After each inspection, the food business receives a risk rating. The frequency of inspection is determined by these risk scores. Food officers carry out both safety and standards inspections at the same visit where possible to ensure efficient use of resources. During each inspection, food businesses are given information and advice on allergens to help them meet their obligations in relation to the 2014 Food Information Regulations and also further legislation which came into force on 1 October 2021 for foods that are pre-packed for direct sale. We will continue to work with businesses to help them achieve compliance with this legislation.

Category	Minimum Inspect. Freq. Food Safety	Minimum Inspect. Freq. Food Standards*
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A	At least every 6 months	At least every 12 months
B	At least every 12 months	At least every 24 months
C	At least every 18 months	Alternative enforcement strategy or intervention every 5 years
D	At least every 2 years	
E	Alternative enforcement strategy or intervention every 5 years	

(*Food Standards inspections focus on different areas of the business, such as composition and labelling. There are fewer inspections required according to the Code of Practice risk rating intervals and whenever possible they are carried out at the same time as the food safety inspection).

Wherever possible, inspections/interventions are carried out unannounced and food officers regularly undertake evening work, and, when necessary, weekend work where the service requires this. The following inspections are due for inspection/intervention during 2023/2024;

Category	Number of Food Hygiene Inspections Due	Number of Food Standards Inspections Due
A	5	2
B	48	64
C	170	141
D	260	N/A
E's	85	N/A
Unrated's at 1st April 2023	31	
New Food Businesses	180 (Approx.)	180 (approx.)
Overdue from 2022/2023	227	291
Total	1006	678

3.1.2 During the Covid19 pandemic, the FSA informed all Local Authorities how they expected food enforcement authorities to respond to the impacts of COVID-19 in relation to the delivery of official food controls. Temporary deviation from the prescribed intervention frequencies set out in the Food Law Codes of Practice was given and the FSA established high and medium priority activities and asked Local Authorities to ensure all high priority work was still delivered throughout the pandemic, this was known as the recovery plan.

High priority work included carrying out onsite visits at;

- establishments identified as a potential public health concern
- establishments subject to ongoing formal enforcement action
- establishments overdue/due an enforcement revisit

The Authority maintained delivery of all high priority work set by the FSA throughout 2022/2023. The service also delivered some medium priority interventions including undertaking re-rating inspections under the Food Hygiene Rating Scheme, inspecting all category A rated premises for food

hygiene and undertaking 973 food hygiene inspections at premises due/overdue an inspection. Due to the backlog of inspections overdue an inspection from the impact of Covid19 on service delivery, 227 food hygiene inspections are overdue from 2022/2023. This is a significant reduction from the previous year, as there were 704 inspections overdue from 2021/2022.

3.1.3 Where a food business fails to comply with significant statutory requirements, Environmental Health Officers are required to undertake a revisit to ensure contraventions have been remedied. During 2022/2023 a total of 81 revisits were carried out. It is estimated that during 2023/2024, 120 revisits may need to be carried out due to an increase in the number of food hygiene inspections being carried out.

3.1.4 When an Environmental Health Officer finds significant breaches of legislation, they may be required to instigate enforcement action in accordance with the Council’s Enforcement Policy. The instigation of enforcement action and subsequent investigations are resource intensive and by their nature, are difficult to forecast. During 2022/2023 the following enforcement was carried out;



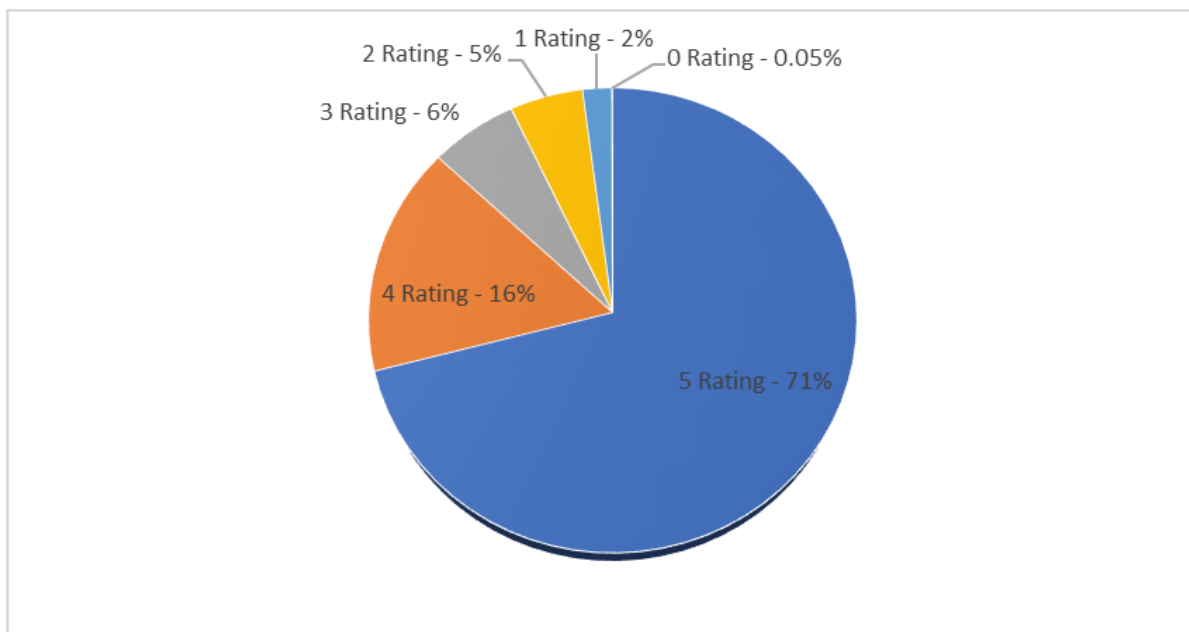
3.1.5 The volume of premises due for inspection as listed above and other associated work, for example revisits, enforcement work cannot be met with the current resources available, particularly, as 2 Food Environmental Health Officer posts in the team are currently vacant. Therefore, arrangements have been made by the Head of Service to support the funding of overtime for qualified food officers to ensure the programmed inspections/interventions for Food Hygiene are completed. With this additional resource, the food hygiene inspection work programme set out in the FSA’s Food Law Code of Practice can be met. Food Standards inspections will be prioritised on a risk basis, i.e. all category A inspections will be completed, and category B and unrated premises will be inspected when they are due a hygiene inspection.

3.2 National Food Hygiene Rating Scheme – Food Standards Agency

Oldham Council participates in the Food Hygiene Rating Scheme whereby qualifying businesses receive a food hygiene rating after their food hygiene

inspection. The highest rating is '5' – 'Very Good' and the lowest rating is 'zero' – 'Urgent Improvement Required'. The scheme includes catering and retail premises and consumers can search for current food hygiene score ratings on the FSA or Oldham Council's websites. This allows consumers to make an informed choice as to where to eat out or buy food. The publication of food hygiene ratings helps to drive up standards.

Distribution of Food Hygiene Ratings



3.3 Complaints/Requests for Service

The food team actively investigates the following types of food complaints;

- Where the nature of the complaint concerns the fitness for human consumption, for example, it has deteriorated or has become contaminated accidentally to an extent that the food would be harmful if eaten
- Contains a foreign object which poses a serious health risk; for example glass or metal
- Contains insects which might suggest a public health problem at the place of retail sale, catering or manufacture for example cockroaches, but not insects like greenfly or caterpillars, which, are naturally occurring and commonly found in fruit and vegetables.

The team offer advice to members of the public on food complaints which do not fall into the categories listed above.

In 2022/2023 the team received the following complaints

Complaints and Requests for Service	
Food Safety Complaints	80

A forecast of 130 food complaints is anticipated in 2023/2024, a volume similar to the year 2022/2023.

3.4 Primary Authority Principle

Although the Food Safety team does not currently act as Primary Authority for any national or regional food company, officers always have regard to the statutory advice and inspection plans when they inspect premises in a primary authority partnership.

The Public Protection Service is currently a partner in the Growth Hub strategy “Better Business for All”. The scheme brings together businesses and regulators to consider and change how local regulation is delivered and received. It involves the creation of local partnerships to identify the issues facing local businesses and shape the provision of effective support services.

3.5 Advice to Businesses

The Food Safety Team provide advice over the phone, free of charge, to food businesses. During 2022/2023, the team dealt with 312 requests for advice. The business or individual who contacts the service for advice will receive contact from an officer within 5 working days of making their request. It is anticipated a similar volume of requests for advice from businesses/individuals will be received during 2023/2024. The current resources available will allow for the team to continue to provide this service. However, during busy periods the response time may be longer the target of 5 working days.

3.6 Food Sampling

Food sampling protects the consumer and provides an invaluable source of intelligence to the service. Samples which are to be analysed for microbiological safety are sent to the appointed Food Examiner at the UK Health Surveillance Agency York Food, Water and Environmental laboratory: services. The appointed public analyst for food standards related matters is Lancashire Scientific Services. The following samples were collected during 2022/2023.

Food Sampling 2022/2023		
	Number of Samples Taken	Unsatisfactory
Microbiological Food Samples	62	6
Food Standards Samples	4	2
Total	66	8

The Food Team aim to increase the sampling rate in the longer term; however, during 2023/2024, proactive sampling for Food Microbiology and Food Standards will be paused to allow resources to be concentrated on the backlog of hygiene interventions from the pandemic.

All unsatisfactory results are fully investigated and officers support food businesses in understanding and achieving compliance. However, in some cases, and in line with the Councils Enforcement Policy, unsatisfactory sampling results may result in enforcement action being undertaken.

The figures in the above table include 12 samples of foods originating from countries outside of the EU. Food safety officers can spend a significant amount of time tracing documentation in order to ensure that imported foods fully comply with UK legislation.

3.7 Infectious Disease Control

Day to day control of food poisoning/infectious disease notifications and investigations is the responsibility of the Food Safety Team and if an outbreak occurs the service works to an infectious disease outbreak plan which has been produced in conjunction with UK Health Security Agency (UKHSA), Greater Manchester Health Protection Team.

In 2022/2023 we received 41 complaints of suspected food poisoning, and a similar volume is forecast for 2023/2024.

Confirmed cases of infectious diseases/food poisoning are notified to the Food Safety Team by UKHSA which are investigated in accordance with public health protocol. During 2022/2023 we received 4 notifications of confirmed cases on food poisoning. All notifications of E coli and legionella are to be responded to within 24 hours.

3.8 Food Alerts

It is estimated there could be 50 national food alerts received this year. Although the majority of these are likely to be for information relating to product withdrawal or recall, each alert requires scrutiny and decisions on what action is to be taken. Where action is necessary the extent of this action will vary. This work can be very resource intensive.

3.9 Liaison with Other Organisations

The food safety team regularly liaises with neighbouring local authorities in relation to enforcement actions, projects/targeted campaigns and application of the Food Hygiene Rating Scheme to ensure consistency. The authority also attends the Greater Manchester Public Protection Managers' Group which represents the 10 Greater Manchester authorities.

In addition, quarterly meetings are also held by the Greater Manchester Food Liaison Group where a representative from Oldham Councils Food Safety attends. The group is used as a forum to achieve consistency of approach in activities.

4.0 RESOURCES

4.1 Financial Allocation

Financial Allocation	2022/2023 Actual	2023/2024 Budget
Staffing	£222,000	£283,000
Sampling Budget	£3,000	£3,000
Provision for Legal Services	£6,600	£6,700

4.2 Staffing Allocation

There are 4.7 FTE officers within the team focussed on the delivery of the food service plan and 0.5 FTE of the Assistant (EH) Manager Post. The structure is illustrated in Appendix 1.

4.3 Staff Development Plan

All officers undergo an annual review under the Council's Appraisal Scheme. Regular team meetings and 1-2-1 meetings are held with staff and any training needs are assessed in accordance with the FSA's Food Law Code of practice. Training needs are monitored to ensure the appropriate 20 hrs of CPD is attained. Officers receive training in several ways. The FSA provide free or subsidised training to ensure officers remain well trained and competent. Oldham Council has also invested in 'on-line' training. AGMA Food Liaison Group and TSNW Group also arrange excellent technical training. Consistency training is carried out in house and all officers participate with the FSA Consistency exercises.

An ongoing review process takes place throughout the year via 1-2-1 meetings and the officers are advised of their performance against the targets set in this Service Plan. A full annual review of performance figures is submitted to FSA under the Local Authority Enforcement Monitoring Scheme via the end of year and mid-year returns. This allows managers to identify any variances and focusses where improvements are necessary.

5.0 QUALITY ASSESSMENT

5.1 Quality assessment and internal monitoring

The service implements several quality monitoring procedures. Response times are built into the Council's Customer Charter for example a first response to all requests for service is to be made within 5 days of receipt. Oldham Council takes customer care seriously and a copy of the Council's Customer Charter is available electronically: https://www.oldham.gov.uk/info/200609/contact/1015/customer_charter/1

To ensure the department meets the Council's Customer Charter monitoring arrangements include, customer satisfaction surveys, verifications and accompanied inspections.

6.0 REVIEW

6.1 Review against the service plan

- The food team completed all high priority work set in the FSA's Recovery Plan. The team also carried out medium priority work which included inspecting all category A rated premises for food hygiene and undertaking 973 food hygiene inspections at premises due/overdue an inspection.
- Revisits to non-compliant premises were carried out and enforcement action was taken where necessary. During 2022/2023 a total of 81 revisits were carried out to food businesses.
- During 2022/2023 the team continued to undertake enforcement work in line with the Council's Enforcement Policy and successfully prosecuted 2 businesses for significant breaches of food legislation and issued 1 simple caution.
- 87% of all service requests were responded to within 5 working days. The service strives to ensure 100% of service requests are responded to within 5 working days.
- All infectious disease notifications received from UKHSA were responded to within 24 hours.
- The team were involved in a Food Standards Agency and Department for Education joint project to assure and support compliance with the School Food Standards. The aim of the project was to see greater levels of compliance, and ultimately school children having access to healthier and more nutritious food. During food hygiene inspections EHO's assessed compliance in relation to the School Food Standards. Instances of non-compliance were raised, and support was provided to schools on how to make improvements. Between October 2022 and March 2023, a total of 51 visits were carried out.

6.2 Identification of any variation from the Service Plan

- During 2022/2023 the authority did not carry out all food hygiene inspections due in accordance with the Food Law Code of Practice frequencies, 227 food hygiene inspections are overdue from 2022/2023. This is due to the backlog created by Covid19 pandemic. All other Local Authorities in Greater Manchester and known to be in a similar or worse position and also most other authorities across the country have significant backlogs of premises overdue an inspection.

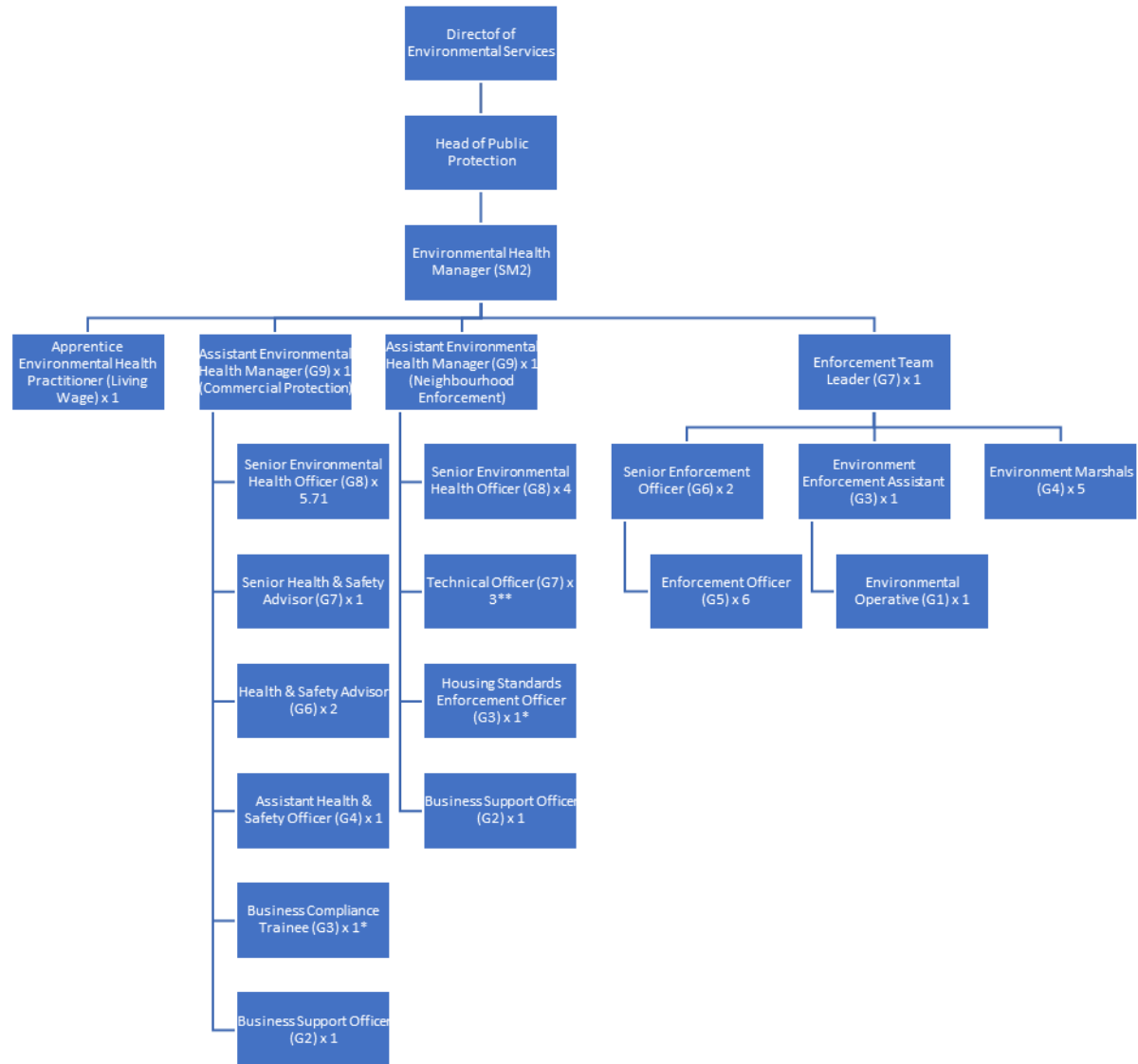
However, the FSA issued advice to all Local Authorities on the delivery of official controls at food businesses during and following the pandemic. The Plan provides a framework for re-starting the delivery system in line with the Food Law Code of Practice for new food establishments and for high-risk and/or non-compliant establishments while providing flexibility for lower risk establishments. The team delivered all high priority interventions set by the FSA in the Local Authority Recovery Plan throughout and following the Covid pandemic.

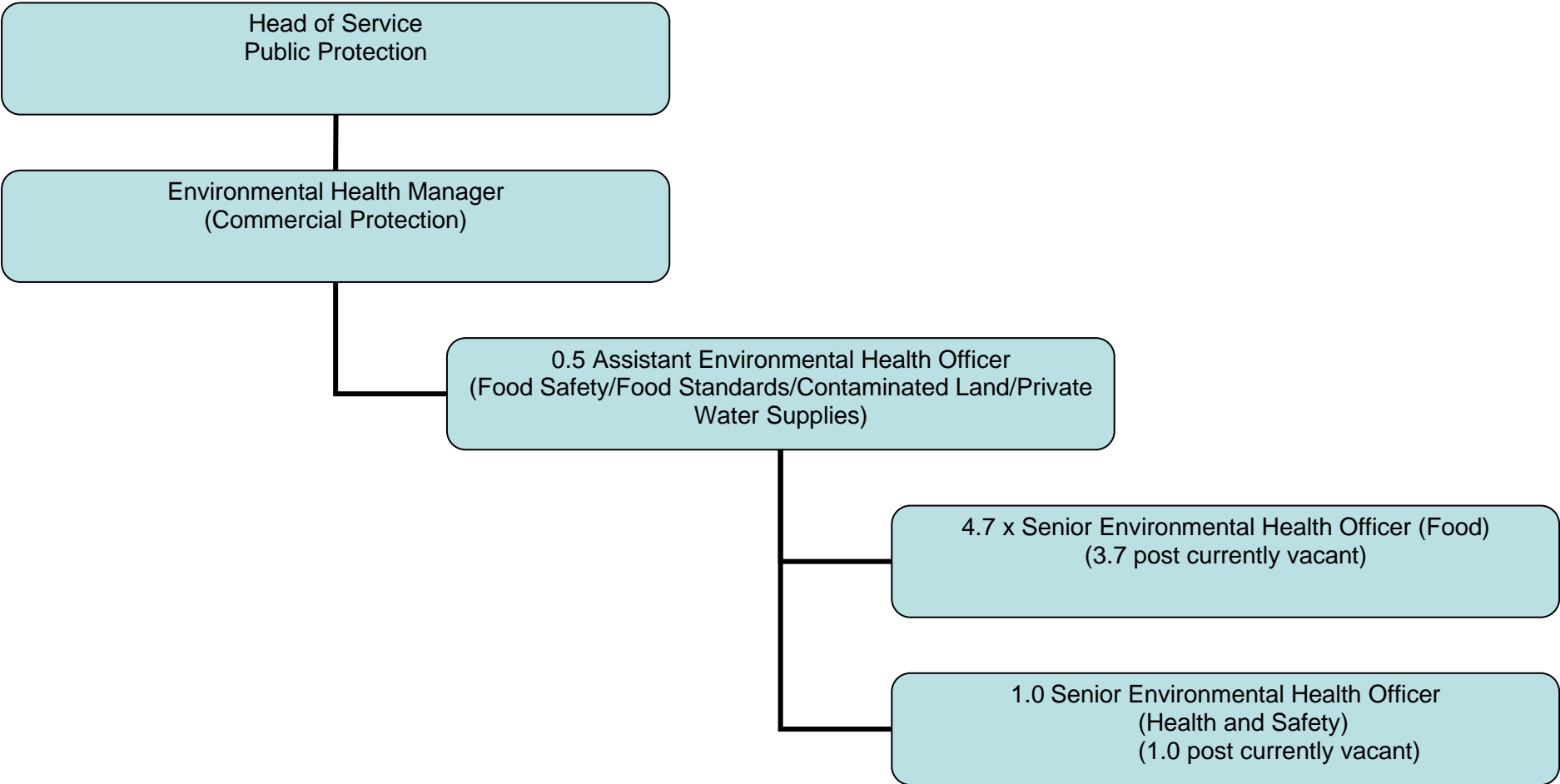
- During 2022/2023 the service responded to 549 requests for service. There were 42 service requests which were not responded to within 5 working days.

These were investigated and appropriate action taken regarding the reason for the response outside of service standards.

6.3 Areas of Improvement

- The Food Team will continue to focus on implementing the FSA's Local Authority Recovery Plan alongside delivery of reactive work including, enforcement in the case of non-compliance, food incidents/hazards, and investigating and managing complaints, undertaking sampling, and ongoing proactive surveillance.
- The FSA's Local Authority Recovery Plan which has been in place since 1st July 2021 will cease after 2023/2024, with all Local Authorities expected to deliver the official controls as set out in the Food Law Code of Practice therefore priority will be given in 2023/2024 to reduce the backlog of premises overdue their food hygiene inspection.
- To allow the work on the inspection programme to be accelerated the **proactive** sampling of foods for microbiological safety in 2022/2023 will be paused. The intention is to resume sampling in 2024/2025 with a longer-term target of increasing sampling to pre-pandemic levels.
- Wherever possible to ensure all requests for service are responded to within 5 working days in line with Oldham Council's customer charter.
- To continue to engage and advise businesses who will be affected by the introduction of labelling legislation in relation to foods that are prepacked for direct sale. Officers will ensure businesses comply with the recent introduction of new labelling requirements in accordance with our enforcement policy.





Public Analyst - Lancashire County Scientific Service, Pedders Way, Ashton-on-Ribble, Preston, Lancashire, PR2 2TX,

Food Examiner - The UK Health Security Agency (UKHSA), Water and Environmental Microbiology Laboratory York, National Agri-Food Innovation Campus, Block 10, Sand Hutton, York, YO41 1LZ